

Poyner Spruill^{LLP}

ATTORNEYS AT LAW

301 S. Fayetteville Street, Ste 1900
Raleigh, North Carolina 27601
(919) 783-6400Please Remit To
P.O. Box 1801
Raleigh, NC 27602-1801

December 6, 2016

Invoice # 1149676

Elke Weber
115 Riverwalk Lane
Jamestown, NC 27282

RE: Class Action Lawsuit against Volkswagen

Fees for Professional Services Through 11/29/16	\$16,733.00
Expense Advances Through 11/29/16	\$346.20

Amount Due For This Invoice	\$17,079.20
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----- SERVICES SUMMARY -----

Partner

SBE Steven B. Epstein	31.40 hrs @ 485.00 per hour	\$15,229.00
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Paralegal

JXK Joanna King	6.40 hrs @ 235.00 per hour	\$1,504.00
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Total Fees	\$16,733.00
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Total Fees and Expenses	\$17,079.20
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12/06/16

Re: Class Action Lawsuit against Volkswagen

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Fees</u>
10/01/15	SBE	Telephone conference and exchange of e-mails with Mr. Malone regarding drafting complaint. cursory review of complaint filed by Mr. Edwards.	0.4	\$194.00
10/02/15	SBE	Edit and revise complaint drafted by Mr. Malone. Exchange of e-mails with Mr. Malone regarding same.	0.6	\$291.00
10/05/15	SBE	Preparation of class action complaint. Exchange of e-mails with Mr. Malone regarding same.	0.5	\$242.50
10/06/15	SBE	Exchange of e-mails with Mr. Malone regarding filing and service of complaint.	0.1	\$48.50
10/13/15	SBE	Telephone conference with Mr. Malone regarding case strategy. Telephone conference with Mr. Lair regarding joining class action. Telephone conference with Ms. Baker regarding possible addition as named plaintiff. Exchange of e-mails with Mr. Malone regarding same.	0.5	\$242.50
10/14/15	SBE	Exchange of e-mails with Ms. Baker regarding purchase documentation. Telephone conferences with Ms. Helms and Mr. Malone regarding possible subclass of used cars.	0.6	\$291.00
10/15/15	SBE	Telephone conference with Messrs. Amato and Pierce regarding possible joinder in class action. Exchange of e-mails with Mr. Malone regarding additional plaintiffs and possible rescission theory. Meeting with Mr. and Mrs. Kidd. Exchange of e-mails with Mr. Malone regarding same.	1.1	\$533.50
10/16/15	SBE	Telephone conference with Mr. Malone regarding possible new plaintiffs. Exchange of e-mails with Ms. McKee and Mr. Malone regarding likely transfer to MDL litigation.	0.4	\$194.00
10/19/15	SBE	Telephone conference with Mr. Malone regarding MDL procedure and possible new clients. Meeting with Messrs. Durham and Amato. Exchange of e-mails with Mr. Malone regarding same.	1.2	\$582.00

12/06/16

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Fees</u>
10/21/15	SBE	Meeting with Messrs. Lair and Pearce to discuss joining class action. Review and analyze motion and memoranda filed in Vinson case in Western District of NC seeking stay in favor of JPMDL. Review docket of JPMDL for New Orleans session in New Orleans.	1.1	\$533.50
10/22/15	SBE	Telephone conference with Mr. Malone regarding new plaintiffs and amended complaint. Exchange of e-mails with Ms. McKee regarding Volkswagen's motion to stay. Preparation of first amended class action complaint. Exchange of e-mails with Mr. Malone regarding same.	1.5	\$727.50
10/26/15	SBE	Review and analyze motion to stay filed by Ms. McKee.	0.2	\$97.00
10/27/15	SBE	Telephone conferences with Mr. Malone regarding amended complaint and e-mail from VW to Ms. Weber.	0.2	\$97.00
10/29/15	SBE	Exchange of e-mails with Mr. Malone regarding amended complaint.	0.1	\$48.50
10/30/15	SBE	Review edits to first amended complaint prepared by Mr. Malone. Exchange of e-mails with clients regarding same.	0.3	\$145.50
11/03/15	SBE	Telephone conference with Mr. Malone regarding new plaintiffs, new possible allegations, and amended complaint.	0.3	\$145.50
11/04/15	SBE	Review JPML filing. Exchange of e-mails with Mr. Malone regarding same and amended complaint.	0.2	\$97.00
11/05/15	SBE	Phone calls and e-mails to prospective new class representatives to be included in amended class action complaint. Edit and revise amended complaint. Exchange of e-mails with Mr. Malone regarding same. Telephone conferences with Ms. Allden and Messrs. Little and Pretorius regarding joinder in class action.	1.8	\$873.00

12/06/16

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Fees</u>
11/06/15	SBE	Telephone conference with potential class rep regarding her Q7 vehicle. Exchange of e-mails with Mr. Malone regarding same. Review Ms. Pretorius's documentation and telephone conference with Ms. Pretorius regarding same. Edit and revise amended complaint and prepare for filing. Exchange of e-mails with Mr. and Mrs. Allden regarding participation in class action. Telephone conference with Mr. Calloway regarding joinder in class action.	1.0	\$485.00
11/09/15	SBE	Exchange of e-mails with Mr. Little regarding joinder in class action. Edit, revise, and finalize amended class action complaint. Exchange of e-mails with Mr. Malone regarding same. Telephone conference with Mr. Barnard regarding joinder in class action. Review and analyze e-mail from Ms. Vogel making VW good will offer. Exchange of e-mails with Mr. Malone regarding same. Telephone conference with Mr. Malone regarding amended complaint and case strategy.	1.4	\$679.00
11/09/15	JXK	Finalize Exhibits to Amended Complaint.	0.2	\$47.00
11/10/15	SBE	Exchange of e-mails with Mr. Barnard regarding joinder in class action complaint. Edit and finalize amended complaint. Intraoffice conference with Ms. King regarding filing amended complaint. Telephone conference with Ms. Moody regarding joinder in class action complaint. Preparation of e-mail to all class representatives regarding amended class action complaint and VW goodwill package. Telephone conference with Mr. Malone regarding filing of amended complaint.	1.5	\$727.50
11/10/15	JXK	Review and proof Amended Complaint. Revise formatting of Amended Complaint (extensive). Finalize Amended Complaint. Add 18 new Plaintiffs to Court file through Court ECF site. Electronically submit Amended Complaint to the Court using electronic case management system. E-mail copy of filed pleading to Michael Malone with instruction re appearing on behalf of new Plaintiffs.	2.7	\$634.50
11/12/15	SBE	Exchange of e-mails with Mr. and Mrs. Weber regarding Goodwill Package offered by VW.	0.1	\$48.50

12/06/16

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Fees</u>
11/16/15	SBE	Telephone conference with Mr. Malone regarding Volkswagen's motion to stay.	0.1	\$48.50
11/17/15	SBE	Telephone conference with Mr. Malone regarding case status.	0.2	\$97.00
11/19/15	SBE	Exchange of e-mails with Mr. Ferguson regarding consent to stay. Exchange of e-mails with Mr. Malone regarding second amended complaint.._	0.1	\$48.50
11/20/15	SBE	Telephone conference and exchange of e-mails with Mr. Malone regarding filing of amended complaint. Edit and revise complaint.	0.3	\$145.50
11/25/15	SBE	Exchange of e-mails with Mr. Malone regarding communications with plaintiffs.	0.2	\$97.00
11/30/15	SBE	Telephone conference with Mr. Malone regarding additional clients.	0.1	\$48.50
12/09/15	SBE	Exchange of e-mails with plaintiffs regarding assignment of MDL to Judge Breyer in Northern District of California.	0.2	\$97.00
12/15/15	SBE	Review correspondence from VW national counsel. Exchange of e-mails with Mr. Malone regarding same.	0.1	\$48.50
12/16/15	SBE	Telephone conference with Mr. Malone regarding possible additional lawsuit in Mecklenburg County.	0.2	\$97.00
12/17/15	SBE	Exchange of e-mails with Mr. Malone regarding appointment of Mr. Feinberg to direct claims process.	0.1	\$48.50
01/05/16	SBE	Telephone conference with Mr. Malone regarding additional plaintiffs.	0.3	\$145.50
01/11/16	SBE	Exchange of e-mails with Ms. Allden regarding appointment of special master.	0.1	\$48.50
01/12/16	SBE	Review news articles on case status.	0.2	\$97.00
01/15/16	SBE	Exchange of e-mails with Mr. Joseph regarding case status.	0.2	\$97.00

12/06/16

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Fees</u>
01/25/16	SBE	Exchange of e-mails with Mr. Malone and plaintiffs regarding appointment of plaintiffs' steering committee.	0.1	\$48.50
01/27/16	SBE	Exchange of e-mails with Mr. Weber regarding plaintiffs' steering committee. Exchange of e-mails with Mr. Hare regarding VW goodwill package.	0.2	\$97.00
02/02/16	SBE	Exchange of e-mails with Ms. Allden regarding possible settlement ideas.	0.4	\$194.00
02/16/16	SBE	Review and analyze news information and docket entries in Volkswagen MDL in California.	0.6	\$291.00
02/24/16	SBE	Telephone conference and exchange of e-mails with Ms. Calhoun regarding representation. Exchange of e-mails with Mr. Malone regarding same.	0.3	\$145.50
02/29/16	SBE	Exchange of e-mails with Ms. Calhoun regarding purchase documentation.	0.1	\$48.50
03/01/16	SBE	Telephone conference and exchange of e-mails with Mr. Wright regarding possible addition to class action.	0.3	\$145.50
03/07/16	SBE	Exchange of e-mails with Mr. Wright regarding joining class action.	0.1	\$48.50
03/08/16	SBE	Review and analyze important filings and docket entries on NDCA docket sheet. Exchange of e-mails with clients regarding case status.	0.6	\$291.00
03/14/16	SBE	Telephone conference with Mr. Applefield regarding his and his daughter's A3 and Jetta and class action rights. Exchange of e-mails with Mr. Applefield regarding same.	0.5	\$242.50
03/15/16	SBE	Exchange of e-mails with Mr. Applefield regarding signed fee agreement and purchase agreement for Audi A3.	0.1	\$48.50
03/18/16	SBE	Exchange of e-mails with Ms. Applefield regarding joinder in class action.	0.1	\$48.50

12/06/16

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Fees</u>
03/24/16	SBE	Review and analyze docket sheet and Web articles on today's hearing before Judge Breyer. Exchange of e-mails with VW clients regarding same.	0.4	\$194.00
04/11/16	SBE	Exchange of e-mails with Ms. Kidd regarding possible sale of vehicle.	0.1	\$48.50
04/20/16	SBE	Review and analyze joint status report filed in MDL.	0.1	\$48.50
04/21/16	SBE	Review minute entry and news article regarding status conference before Judge Breyer. Telephone conference with Mr. Malone regarding same.	0.2	\$97.00
04/27/16	SBE	Preparation of e-mail to clients regarding hearing before Judge Breyer and possible class settlement.	0.2	\$97.00
04/29/16	SBE	Exchange of e-mails with Ms. Weber regarding case status.	0.1	\$48.50
06/13/16	SBE	Review case docket and media accounts. Exchange of e-mails with clients regarding case status.	0.5	\$242.50
06/21/16	SBE	Review and analyze news information on delay in VW hearing to announce settlement.	0.1	\$48.50
06/22/16	SBE	Telephone conference with Mr. Malone regarding impending settlement.	0.1	\$48.50
06/27/16	SBE	Exchange of e-mails with Mr. Little regarding possible VW settlement.	0.1	\$48.50
06/28/16	SBE	Review news article on VW settlement.	0.1	\$48.50
06/29/16	SBE	Begin review of class action settlement notice. Exchange of e-mails with Mr. Malone regarding same. Intraoffice conference with Ms. King regarding same. E-mail to clients regarding same.	0.2	\$97.00
07/01/16	SBE	Exchange of e-mails with Ms. Weber regarding settlement details. Telephone conference with Mr. Malone regarding status of class action settlement.	0.4	\$194.00

12/06/16

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Fees</u>
07/06/16	SBE	Exchange of e-mails with Mr. Durham regarding settlement terms. Review and analyze Exhibit 6 to settlement agreement.	0.2	\$97.00
07/07/16	JXK	Research to cross-reference client's vehicle VIN numbers against estimated settlement payments as filed in proposed settlement. Prepare spreadsheet detailing proposed buyback amounts and proposed approved emissions modification amounts for each client.	2.2	\$517.00
07/08/16	SBE	Review settlement agreement terms. Exchange of numerous e-mails with clients regarding same and providing values for each client for buyback and restitution. Telephone conference with Mr. Malone regarding same.	1.0	\$485.00
07/11/16	SBE	Exchange of e-mails with Mr. Amato regarding attorneys' fees.	0.1	\$48.50
07/13/16	SBE	Exchange of e-mails with Mr. Malone regarding attorneys' fees.	0.1	\$48.50
07/30/16	SBE	Review news article on preliminary approval of settlement.	0.1	\$48.50
08/05/16	SBE	Telephone conference with Mr. Bernard regarding his unique situation having sold his vehicle. Intraoffice conference with Ms. King regarding same. Telephone conference with Mr. Malone regarding attorneys fees.	0.5	\$242.50
08/10/16	JXK	Begin research of all settlement documents to determine (i) compensation for client that sold vehicle during settlement process, (ii) compensation process for client who is a lien holder, and (iii) whether client can experience fixed vehicle prior to making compensation decision. Detailed e-mail memorandum to file regarding same.	0.8	\$188.00
08/16/16	SBE	Telephone conference with Louisiana counsel regarding attorneys fees issue. Exchange of voice mails with Womble Carlyle counsel regarding extended warranty issue.	0.7	\$339.50

12/06/16

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Fees</u>
08/16/16	JXK	Complete research of Settlement paperwork, determining lack of compensation regarding factory bought Warranties. Update detailed e-mail memorandum responding to all research questions.	0.3	\$70.50
08/17/16	SBE	Preparation of extensive e-mail to clients setting forth benefits of class action settlement. Exchange of e-mails with Mr. Malone regarding same. Exchange of e-mails with Messrs. Lair and Amato regarding specific questions about settlement.	1.2	\$582.00
08/18/16	SBE	Telephone conference and exchange of e-mails with Mr. Bernard regarding unique situation associated with settlement. Telephone conference with VW counsel regarding attorneys fees and eligible seller issue for Mr. Bernard.	0.5	\$242.50
08/19/16	SBE	Exchange of e-mails with class counsel regarding Mr. Bernard's unique situation.	0.3	\$145.50
08/22/16	SBE	Exchange of e-mails with Ms. Alden regarding class action notice. Telephone conference with Mr. Berndard regarding sales documentation requested by Ms. Cabraser. Exchange of e-mails with Ms. Cabraser regarding same.	0.2	\$97.00
08/30/16	SBE	Exchange of e-mails with Ms. Cabraser regarding Mr. Bernard's specific issue regarding trade-in of class vehicle. Exchange of e-mails with Mr. Malone regarding communications with clients.	0.2	\$97.00
09/01/16	SBE	Telephone conference with Ms. Cabresa's associate regarding Mr. Bernard's eligible seller issue. Exchange of e-mails with Mr. Bernard regarding same. Review plaintiffs' filing regarding attorneys fees. Exchange of e-mails with Mr. Malone regarding same.	0.5	\$242.50
09/12/16	SBE	Exchange of e-mails with VW owners regarding opt-out date.	0.1	\$48.50
09/13/16	SBE	Exchange of e-mails with Ms. Weber regarding attorneys' fees.	0.1	\$48.50

12/06/16

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Fees</u>
10/25/16	SBE	Telephone conference with Mr. Malone regarding judicial approval of class action settlement.	0.2	\$97.00
10/27/16	SBE	Exchange of e-mails with all 18 clients regarding request for payment of attorneys' fees.	1.0	\$485.00
10/28/16	SBE	Exchange of e-mails with several clients regarding settlement logistics and attorneys' fees.	0.4	\$194.00
10/31/16	SBE	Exchange of e-mails with Mr. Amato regarding settlement.	0.1	\$48.50
11/02/16	SBE	Exchange of e-mails with Ms. Calhoun regarding buyback offer.	0.1	\$48.50
11/02/16	JXK	Review estimated settlements against Jane Calhoun's VIN number to confirm that amounts previously listed have not changed, and that buy back amount is \$19,000-\$21,000, minus AEM amount.	0.2	\$47.00
11/03/16	SBE	Exchange of e-mails with Ms. Calhoun regarding settlement with Volkswagen.	0.1	\$48.50
11/08/16	SBE	Exchange of e-mails with clients regarding VW buyback process.	0.1	\$48.50
11/28/16	SBE	Exchange of e-mails with Mr. Lair regarding buyback process with Volkswagen.	0.1	\$48.50
Total Hours				37.80
Total Fees				\$16,733.00

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Invoice # 1149676

12/06/16

Expense Advances

<u>Date</u>	<u>Description</u>	<u>Amount</u>
11/30/15	Research Expenses VENDOR: Pacer Service Center INVOICE#: 0120160108 DATE: 11/30/2015	\$0.80
12/06/16	Research expenses for Pacer DATE: 12/06/2016 VENDOR: Pacer Service Center	\$40.40
11/30/16	Research expenses for Pacer Filing Fees - USDC - CA	\$305.00
		<hr/> \$346.20

Total Disbursements

Total This Invoice \$17,079.20

12/06/16

301948.00002000
Invoice # 1149676

REMITTANCE PAGE

Invoice Amount:	\$17,079.20
Invoice Date:	12/06/16
Matter Number:	301948.00002000
Invoice Number:	1149676

Billing Atty:	1040	Epstein, Steven B.
Originating Atty:	1040	Epstein, Steven B.
Supervising Atty:	1040	Epstein, Steven B.

(Prebill # 161959)

Poyner Spruill LLP exists to provide professional services of superior value which exceed our clients' expectations. If you are not completely satisfied with our work described on this statement, please contact Dean Hartmann, Credit Manager, at 919-783-2815 (toll free: 1-866-331-0980) or by email to dhartmann@poynerspruill.com.

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE TO

**Poyner Spruill LLP
P. O. Box 1801
Raleigh, NC 27602-1801**

FOR PAYMENTS BY CREDIT CARD, ACH OR WIRE:

Call **919-783-2934** or Email **acctsrec@poynerspruill.com**

INVOICE IS PAYABLE UPON RECEIPT